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06 February 1984

Points for Discussion with the DDCI

25X1 1. [ ] Deputy Director for COMSEC, NSA, dated 13 December 1983, implies that an agreement was struck between the DDCI and [ ] that the proposed NSDD would be limited to communications security, and a separate NSDD/PD would be written to address computer security. The latest version is basically unchanged from the 23 September 1983 draft. [ ]

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2. The letter of transmittal from the NSC states that "It is intended that the machinery established by this NSDD would initially focus on those automated systems which are connected to telecommunications systems." The body of the NSDD does not follow this statement of intent and is all inclusive for "automated information systems which create, prepare, or manipulate information in electronic form for purposes other than telecommunications, and includes computers, word processing systems and associated equipment." (Para 11.b) [ ]

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3. Page 3, Paragraph 4.a. In our opinion, the Secretary of State, as the Senior Cabinet member, should be a member of the Systems Security Steering Group. [ ]

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4. Page 3, Paragraph 4.a.(1) Should be rewritten to state; The Steering Group shall: (1) oversee and ensure the implementation of this directive. The remainder of the statement should be deleted. [ ]

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5. Page 3, Paragraph 4.a.(2) Should be deleted. This is a restatement of 4.a.(1) above. [ ]

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6. Page 3, Paragraph 4.b. Should be deleted. The National Manager for Telecommunications and Information Systems Security (Director, NSA), if established, should take direction from the Systems Security Steering Group, the National Telecommunications and Information Systems Security Committee, and the Executive Agent for Telecommunications and Information Systems Security. If the National Manager for Telecommunications and Information Systems Security functions as the Executive Secretary to the Steering

WARNING NOTICE  
INTELLIGENCE SOURCES  
OR METHODS INVOLVED

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NSC review

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Group, it would be analogous to the fox guarding the chicken coup because he/she would be in a position to submit proposals and influence the decisions of the Steering Group without the knowledge or concurrence of the NTISSC or the Executive Agent. [redacted]

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*There is an informal agreement between NSA & DOD that DOD will chair.*  
7. Page 4, Paragraph 5.a. Should be specific on who will chair the NTISSC. It should not be NSA. All members of the NTISSC should be voting members. As written, the Secretary of Defense is not represented on the Committee, and the Secretary of the Treasury and the Director of Central Intelligence are non-voting members. [redacted]

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8. Page 4, Paragraph 5.b.(4) states that the NTISSC shall: "(4) establish and maintain a National System for promulgating the operating policies, directives, and guidance which may be issued pursuant to this directive." There is no reference to who will sign the doctrine. [redacted]

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Page 5, Paragraph 6 states that the Secretary of Defense as the Executive Agent for Telecommunications and Information Systems Security shall: "be responsible for implementing, under his signature, the policies developed by the NTISSC." [redacted]

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Page 6, Paragraph 7 and Subparagraph 7.f states: "The Director, NSA is designated the National Manager for Telecommunications and Information Systems Security and is responsible for carrying out the foregoing responsibilities of the Secretary of Defense as Executive Agent. In fulfilling these responsibilities the Director, NSA shall have authority to: "(f) prescribe the minimum standards, methods and procedures for protecting cryptographic and other sensitive technical security material, techniques, and information." [redacted]

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Page 8, Paragraph 8.b states "The heads of Federal Departments and Agencies shall: "Ensure that the policies, standards and doctrine issued pursuant to this directive are implemented within their departments and agencies." [redacted]

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In our opinion, the above paragraphs as written delegates to Director, NSA carte blanche authority to promulgate policies, directives, guidance and standards, under

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his signature, without an explicit right to challenge by any department or agency of the Government. [ ]

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9. Page 5, Paragraph 5.d. We question the rationale behind the stipulation that "the NTISSC shall have a permanent secretariat composed of personnel of NSA." We see no reason why personnel from other departments or agencies cannot staff the secretariat. [ ]

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10. Pages 6 and 7. Paragraph 7 should be deleted or reconstituted along the lines of NSDD-97. All of the authorities of the proposed NSDD are delegated to the Director, NSA without any provisions for veto or non-compliance by other departments or agencies. [ ]

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11. Page 7, Paragraph 8.a. This subparagraph is inconsistent with Paragraph 7. If the Director, NSA does not achieve all of the objectives outlined in Paragraph 7, the heads of the Departments and Agencies cannot be responsible for achieving and maintaining an acceptable security posture. NSA will determine what is included in the budget recommendation - See Paragraph 7.g. [ ]

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12. Page 7, Paragraph 9.a. The wording in this subparagraph is so ambiguous that it gives Director, NSA authority to insist on coordination on almost any subject related to the protection of sources and methods. [ ]

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13. Page 8, Paragraph 10.b. The last phrase should be deleted. It is subject to misinterpretation. [ ]

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14. Pages 8 and 9. The definitions are so conflicting and inconsistent that they should be deleted or restated with consistent wording. [ ]

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15. Page 9, Paragraph 12. The missions and functions of the Interagency Committee on Foreign Real Estate Acquisition in the U.S. should be as stated in the original [ ] [ ]

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16. Page 9, Paragraph 14. There are a number of initiatives mandated by [ ] that have not been started or completed for a number of reasons. This abrupt termination of those initiatives may cause more harm than all of the other provisions of the revised PD/NSDD. Example: there has been

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